

UNITED STATES DISTRICT COURT  
IN THE WESTERN DISTRICT OF MICHIGAN

TIMOTHY ANDERSON,  
Plaintiff,

-vs.-

Case No. 1:12-cv-00498  
Judge Janet Neff

TATE AND KIRLIN ASSOCIATES, INC.,  
a Pennsylvania corporation,  
Defendant.

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**REQUEST FOR ENTRY OF CLERK'S DEFAULT**

Pursuant to Fed.R.Civ.P. 55 and L.R.Civ.P. 55.1, Plaintiff requests that this court enter the default of the Defendant as follows:

1. Plaintiff sued the Defendant for a violation of the Federal Fair Debt Collection Practices Act at 15 U.S.C. 1692 et. seq.
2. On June 7, 2012, the Plaintiff served the Defendant with the complaint herein via certified mail to the Defendant's resident agent, National Registered Agents, Inc at 712 Abbott Road, East Lansing, MI 48823.
3. Pursuant to Fed.R.Civ.P. 12a, the Defendant's answer to this action was due on June 28, 2012.
4. On June 11, 2012, the Plaintiff filed her proof of service against the Defendant with the court (Docket 4).
5. Defendant has, as of July 6, 2012, failed to plead or otherwise defend against this action and is now in default.
6. Defendant is not an infant, an incompetent person or in the military.

Respectfully submitted.

July 6, 2012

/s/ Gary D. Nitzkin  
GARY D. NITZKIN (P 41155)  
NITZKIN & ASSOCIATES  
Attorneys for Plaintiff  
22142 West Nine Mile Road  
Southfield, MI 48034  
(248) 353-2882  
Fax (248) 353-2882  
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**AFFIDAVIT IN SUPPORT OF REQUEST FOR ENTRY OF CLERK'S DEFAULT**

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Further Affiant Saith Not.

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July 6, 2012

  
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GARY D. NITZKIN (P 41155)  
NITZKIN & ASSOCIATES  
Attorneys for Plaintiff  
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Southfield, MI 48034  
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Subscribed and sworn to before me this 10<sup>th</sup> day of July, 2012.

Leahy Clebs *in person*  
Notary Public, Oakland County, MI  
My commission expires: 10/12/2012